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20           UNITED STATES BANKRUPTCY COURT  
21           NORTHERN DISTRICT OF CALIFORNIA  
22           SAN FRANCISCO DIVISION

23           In re:

24           Bankruptcy Case  
25           No. 19-30088 (DM)

26           PG&E CORPORATION

27           Chapter 11  
28           (Lead Case)  
29           (Jointly Administered)

30           PACIFIC GAS AND ELECTRIC  
31           COMPANY,

32           Debtors.  
33           **DEBTORS' AND SHAREHOLDER  
34           PROPONENTS' RESPONSE TO  
35           REVISED SUPPLEMENTAL  
36           DISCLOSURE IN THE FORM OF A  
37           LETTER FROM THE TCC**

- 38            Affects PG&E Corporation  
39            Affects Pacific Gas and Electric Company  
40            Affects both Debtors

41           *\* All papers shall be filed in the Lead Case,  
42           No. 19-30088 (DM).*

43           Date: April 7, 2020  
44           Time: 10:00 a.m. (Pacific Time)  
45           Place: United States Bankruptcy Court  
46           Courtroom 17, 16th Floor  
47           450 Golden Gate Avenue  
48           San Francisco, CA 94102

49           Re: Docket No. 6636 and 6682

1 The TCC’s revised Proposed Letter does nothing to address the multiple inaccuracies and  
2 falsehoods of the original letter. Yet, the TCC still seeks the shield of the Court’s approval of  
3 these statements *and* wants to broadcast that imprimatur to fire claimants. The very first  
4 paragraph of the Proposed Letter states that “[t]he bankruptcy court approved or permitted the  
5 TCC sending this letter to you.” Revised Proposed Letter [ECF 6682-1] at 1. The obvious  
6 intention is to give fire claimants the impression that the Court agrees with its contents. And,  
7 despite removal of the explicit recommendation not to vote on the Plan, the Proposed Letter can  
8 only be construed as intended to persuade fire claimants to withhold their ballots. There is no  
9 other plausible purpose of the communication.

10 For all the reasons previously stated, this is inappropriate. If the TCC wants to try to  
11 influence balloting on the Plan, the TCC should decide for itself what communication is  
12 appropriate under the Bankruptcy Code and take responsibility for any ensuing consequences of  
13 its actions. Any such communication must not reference or otherwise imply that the Court has  
14 reviewed or approved its contents, and the Court should not sanction or otherwise provide the  
15 immunity sought by the TCC.

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Dated: April 7, 2020

**WEIL, GOTSHAL & MANGES LLP  
KELLER BENVENUTTI KIM LLP**

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